



# **Air Quality Permitting Statement of Basis**

**April 26, 2005**

**Permit to Construct No. P-050107**

**Coeur d'Alene Paving, Inc., Portable**

**Facility ID No. 777-00357**

Prepared by:

Bill Rogers  
Regional Permit Program Coordinator  
Air Quality Division

**FINAL**

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## Acronyms, Units, and Chemical Nomenclatures

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
CDA Paving	Coeur d'Alene Paving, Inc.
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
°F	degrees Fahrenheit
ft	feet
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
kW	kilowatt
MACT	Maximum Achievable Control Technology
MMBtu/hr	million British thermal units per hour
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
T/hr	tons per hour
VOC	volatile organic compound

## **1. PURPOSE**

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

## **2. FACILITY DESCRIPTION**

This facility is a portable hot-mix asphalt facility. The facility consists of a portable, drum-mix asphalt plant rated at 400 T/hr, and an electrical generator rated at 635 kW. Graded aggregates and oil are combined in the drum dryer to produce asphaltic concrete. The drum dryer burner is fuel by either natural gas or propane gas. The generator is used to provide electricity to the hot-mix asphalt plant when line power is not available. The generator can be fuel by distillate fuel oil, natural gas, or propane gas.

## **3. FACILITY / AREA CLASSIFICATION**

The facility is classified as a synthetic minor facility because enforceable operational limits limit the facility's potential to emit to less than Tier I operating permit major source thresholds. The AIRS facility classification is "SM80". The SIC code defining this facility is 2951.

The facility is portable and is allowed to operate in PM<sub>10</sub> attainment or unclassifiable areas and PM<sub>10</sub> nonattainment areas or proposed PM<sub>10</sub> nonattainment areas.

The AIRS information provided in the appendix defines the classification for each regulated air pollutant at this facility. This required information is entered into the EPA AIRs database.

## **4. APPLICATION SCOPE**

Coeur d'Alene Paving, Inc. (CDA Paving) submitted a PTC application for a revision of an existing PTC. CDA Paving has purchased the portable hot-mix asphalt facility formerly owned and operated by Quad Cities Construction, Inc. (Quad Cities). Quad Cities was issued PTC No. 777-00205 on June 10, 1997 for the facility. CDA Paving has requested that the June 10, 1997 PTC be revised to reflect a change in ownership and change in the facility's name. CDA Paving has certified, pursuant to IDAPA 58.01.01.123, that it will comply with all of the existing terms and conditions of the permit. No other changes were requested.

### **4.1 Application Chronology**

April 8, 2005	CDA Paving submitted a PTC revision application
April 26, 2005	DEQ determines application complete

## **5. PERMIT ANALYSIS**

This section of the Statement of Basis describes the regulatory requirements for this PTC action:

### **5.1 Equipment Listing**

CDA Paving's portable hot-mix asphalt plant and electrical generator operating parameters are listed below.

#### Portable Hot-mix Asphalt Plant

- Type: Drum mix
- Maximum throughput capacity: 400 T/hr
- Allowable burner fuel: Natural gas or propane gas
- Maximum burner heat capacity: 120 MMBtu/hr
- Stack height (ft): 44.3
- Stack diameter (ft): 5.16
- Exhaust gas flowrate (acfm): 77,000
- Exhaust gas temperature (°F): 300

#### Baghouse Control Device

- Manufacturer: CMI
- Model No.: RA-418P

#### Electrical Generator

- Allowable output capacity: 635 kW
- Allowable fuel type: distillate fuel oil, natural gas, or propane gas
- Stack height (ft): 12.2
- Stack diameter (ft): 0.67
- Exhaust gas flowrate (acfm): 4,958
- Exhaust gas temperature (°F): 1,007

### **5.2 Emissions Inventory**

Emissions are not increasing; therefore, an emissions inventory is not required.

### **5.3 Modeling**

Emissions are not increasing; therefore, a modeling analysis is not required.

### **5.4 Regulatory Review**

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.201..... Permit to Construct Required

This facility does not qualify for a PTC exemption in any Sections 220 through 223 of the Rules. Therefore, a PTC is required.

IDAPA 58.01.01.209.04..... Revisions of Permits to Construct

This facility has shown to DEQs satisfaction that its emissions will not cause or contribute to a violation of any ambient air quality standard. So long as CDA Paving complies the terms and conditions of the permit, all applicable air quality standards will be met. Revisions to PTCs that do not result in an increase in emissions are not required to be provided for an opportunity for public comment.

IDAPA 58.01.01.224..... Permit to Construct Application Fee

A change in the name and ownership is exempt from PTC application fees.

IDAPA 58.01.01.225..... Permit to Construct Processing Fee

PTC processing fees are not required for a PTC revision.

40 CFR 60 ..... New Source Performance Standards

CDA Paving's portable hot-mix asphalt plant is an affected facility in accordance with 40 CFR 60.90. An initial performance test was conducted in 1994 and demonstrated compliance with the NSPS standard. Idaho DEQ, however, has not reviewed or approved the test.

40 CFR 61 ..... National Emissions Standards for Hazardous Air Pollutants

The facility is not subject to any NESHAP requirements pursuant to 40 CFR 61.

40 CFR 63 ..... National Emissions Standards for Hazardous Air Pollutants for  
Source Categories

The facility is not subject to any MACT requirements pursuant to 40 CFR 63.

## **5.5 Fee Review**

PTC application fees and processing fees do not apply.

## **6. PERMIT CONDITIONS**

This section explains any changes made to the existing permit as a result of this permit revision. No changes made result in an increase in emissions. Existing permit conditions are identified as "Existing Permit Condition" and revised permit conditions are identified as "Revised Permit Condition."

The existing permit does not separate the permit conditions for the hot-mix asphalt plant and the generator. For clarity, the revised permit separates the two sources. The following describes what changes were made.

Existing Permit Conditions 1.5, 2.9, 3.1.3, and 3.1.4 regulate the generator operations. Generator operations are now regulated in Section 3 of the revised permit. Existing Permit Conditions 1.5, 2.9, 3.1.3, and 3.1.4 are now Revised Permit Conditions 3.3, 3.5, and 3.7, respectively. Existing Permit Conditions 3.1.3, and 3.1.4 have been combined under Revised Permit Condition 3.7.

Revised Permit Conditions 3.6 and 3.7 have been added because the generator is allowed to burn distillate fuel oil. Revised Permit Condition 3.6 is the fuel sulfur content limit regulation pursuant to IDAPA 58.01.01.728, and Revised Permit Condition 3.7 is the corresponding monitoring and recordkeeping requirement. The existing permit did not contain these requirements and they are applicable requirements.

Existing Permit Conditions 2.7, 2.8, and 3.2.2 have been deleted because they apply to a wet scrubber. This facility uses a baghouse, not a wet scrubber. The revised permit retains all requirements required for baghouse operations.

Existing Permit Condition 3.4 (performance testing) has been retained in the revised permit as Revised Permit Condition 2.17. Quad Cities satisfied the NSPS initial performance testing requirement in 1994. That test, however, was not reviewed or approved by Idaho DEQ. For this reason, DEQ is requiring that a subsequent performance test be conducted within 180 days after startup. To assure the hot-mix asphalt plant continues to meet applicable air quality standards, additional testing is required at least once every five years from the issuance date of the revised permit.

Existing Permit Condition 4.1 (relocation) is now General Provision 5.9 in the revised permit.

## **7. PUBLIC COMMENT**

An opportunity for public comment was not required because the permitting action is a revision to a PTC and emissions are not increasing.

## **8. RECOMMENDATION**

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that Coeur d'Alene Paving, Inc. be issued final PTC No. P-050107 for the construction of a portable hot-mix asphalt facility. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

BR/sd Permit No. P-050107

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***APPENDIX***

***AIRS Information***

***Coeur d'Alene Paving, Inc.***

***P-050107***

# AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM

Updated June 14, 2005

**Facility Name:** Coeur d'Alene Paving, Inc.  
**Facility Location:** Portable  
**AIRS Number:** 777-00357

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO <sub>2</sub>	B							U
NO <sub>x</sub>	B							U
CO	SM					SM80		U
PM <sub>10</sub>	B							A, U, N
PT (Particulate)	B		B					U
VOC	B							U
THAP (Total HAPs)	B							U
			APPLICABLE SUBPART					
			I					

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, **or** each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides)